

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

CHESAPEAKE ENERGY CORPORATION, §
An Oklahoma corporation, §

Plaintiff, §

VS. §

Case No. 5:07-cv-00318-C

TXD SERVICES LP, a Texas limited §
Partnership, §

Defendant. §

DEFENDANT TXD SERVICES, LP'S REQUESTED VOIR DIRE

Defendant, TXD Services, LP, requests the Court to submit the following questions to the respective jurors:

1. This case involves a contract dispute between the Plaintiff, Chesapeake Energy of Oklahoma City and TXD Services, a drilling company in Ft. Worth, Texas. Chesapeake Energy seeks to have it determined that it did not breach the contracts. Defendant TXD has counterclaimed against Chesapeake for damages caused by Chesapeake's alleged breach of contract.

2. Chesapeake is represented by Jessie Pierce of the firm of King & Spalding in Houston, Texas and in-house lead counsel for Chesapeake of Mike Harris and Fred Gipson. Do any of you know any of these lawyers or any members of their law firms?

3. The Defendant TXD Services is represented by trial counsel, Terry Tippens, Mark Stonecipher and Lance Leffel of the Oklahoma City law firm of Fellers,

Snider, Blankenship, Bailey & Tippens. Do you know any of these lawyers or members of their firm?

4. The Plaintiff Chesapeake has listed the following individuals as witnesses:

- (a) Darvin Knapp
- (b) Joseph Kennedy
- (c) Steven W. Miller
- (d) Dave Winchester
- (e) Randy Patterson
- (f) Mark Deal
- (g) Richard Thompson
- (h) Steve Donley
- (i) Duane Yost
- (j) Sam McCaskill
- (k) Greg Pearce
- (l) Joe Poe
- (m) Ed Breiner
- (n) Frank C. Gabriel, Jr., P.E.
- (o) Greg Hillier
- (p) Norm Bennett
- (q) Dewayne G. Vogt
- (r) Jerry Bell

(s) Terry L. Brittenham

(t) Mark Trevithick

The Plaintiff may or may not call any of these people as witnesses, but do you know any of these people?

5. The Defendant TXD has listed most of the same individuals as witnesses plus the following additional witnesses:

(a) Dick Varnell

(b) William Cowles

(c) Eric Reuterfors

(d) Charles Grady

(e) Mark Merideth

(f) Charles Dolby

(g) Dwayne "Pop" Freeman

(h) Paul M. Earl, Jr.

The Defendant may or may not call all of these people as witnesses. Do you know any of these people?

6. Because this case involves four (4) new drilling rigs and long term drilling contracts between TXD and Chesapeake, we need to find out what your level of knowledge is or experience may have been in the oil and gas industry.

a) First, do any of you or your immediate friends or family have any direct employment with either Chesapeake Energy or TXD?

- b) What about Devon Energy, SandRidge Energy , Gulfport Energy or any other oil or gas company?
- c) Do any of you or your immediate family or friends work in the oil and gas industry such that you might have some knowledge or contact with Chesapeake Energy or TXD?
- d) What is your understanding of or relationship with Chesapeake Energy or TXD?
- e) Do you own any stock in Chesapeake Energy or any other similar type oil and gas company? And if so, which company?
- f) Have any of you seen billboard or TV advertising by Chesapeake? If so, did that create in your mind a favorable impression, unfavorable impression or generally a neutral impression? Can you be fair and impartial as to TXD as a company in Texas which does not advertise in Oklahoma?

7. Have any of you had any experience in the oilfield and in particular the drilling industry and operation of drilling rigs?

8. Have any of you been involved in a lawsuit, excluding divorces or child custody proceedings, and if so what was the nature of that litigation?

9. Have any of you been involved in contract disputes whether or not they led to the filing of a lawsuit. If so, please explain?

10. What is your opinion with regard to people's use of the courthouse for resolving contract disputes?

11. Today we are looking to discover any possible bias, however slight you may have for or against either of these parties. In order that we may obtain a totally fair and impartial jury to both parties, we want you to speak up if you believe that you have any bias, prejudice or preconceived beliefs one way or the other for or against either party or if you have any opinions about litigation that the attorneys should know. Lawyers and judges are incapable of asking you all of the right questions that would reveal any personal biases or prejudices in order that the lawyers can exercise their preemptive strikes of potential jurors. Therefore, with what you have heard about the case, is there anything you would want to tell the lawyers about any of your personal views, opinions or prejudices that might cause them to think that you would not be totally fair and impartial to both parties? Please speak up after some opportunity to think about that question.

12. Is there anything going on in your life or at work that would prevent you from giving this case your full time and attention for a week or less?

13. Go over the following individual questions to each juror:

- a) What is your educational background?
- b) Where do you currently work? Do you have any past employment which may be in anyway related to the oil field industry?
- c) Do any of your family members or friends work in the oil field industry and, if so, in what capacity and for whom?
- d) If married, where does your spouse work?
- e) In recent times what is your favorite book or movie?

- f) Do you have a favorite talk radio show? If so, which one?
- g) How do you like to spend your leisure time?
- h) What are your job responsibilities including what you like best about your job and what you like least about your job?
- i) How would you describe your basic personality?
- j) Does any juror have any expertise in engineering?
- k) In particular, do you have any expertise or education in mechanical or structural engineering?

14. This case involves four (4) very expensive drilling rigs, each of which was contracted by TXD to Chesapeake for approximately \$18,000 a day for two (2) years. That adds up to \$13 million per rig times four or \$52 million over four (4) years. The Defendant TXD is a Plaintiff by counterclaim seeking damages of several million dollars. Does any juror, because of the magnitude of the monetary claims in this case, have any issues or claims with granting a verdict in a large amount if the evidence supports the claim?

15. Some people feel that it is not right to award a large money verdict. Does any juror have such an opinion or feeling if the evidence warrants it?

16. Has any juror had specific experience with a broken contract or people breaching verbal promises or commitments to you? If so, how did you feel about that?

17. If you were a litigant in this case, is there any reason you would not want you as a juror?

18. Do any of you know of a reason why you would have any reservations about serving on this jury?

19. Have you ever held a job where you were required to apply or interpret contracts?

a) If so, please describe.

20. Have you or any member of your family or anyone you know been injured on the job?

a) If so, please describe.

21. Have you ever started or owned your own business?

a) If so, what?

22. We are dealing with two corporations as parties. Chesapeake is located in Oklahoma City, although it has significant drilling activities in the state of Texas and TXD is located in Ft. Worth, Texas. Does anyone have any bias or prejudice against corporations? And in particular, does anyone feel that because an Oklahoma corporation is involved and a Texas corporation is involved that the Oklahoma corporation should be given any favoritism in this case?

23. Will you wait until both parties have presented their evidence and I have instructed you on the law before you make your decision in this case.

Respectfully submitted,

s/ Lance E. Leffel

Terry W. Tippens, OBA #9027
Mark K. Stonecipher OBA #10483
Lance E. Leffel, OBA #19511
FELLERS, SNIDER, BLANKENSHIP,
BAILEY & TIPPENS, P.C.
100 N. Broadway, Suite 1700
Oklahoma City, OK 73102-8820
(405) 232-0621 Telephone
(405) 232-9659 Fax
ttippens@fellerssnider.com
mstonecipher@fellerssnider.com
lleffel@fellerssnider.com

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of January, 2008, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit Notice of Filing to the following ECF registrants: Fred R. Gipson, Michael G. Harris, and Jesse R. Pierce.

s/ Lance E. Leffel

Lance E. Leffel

429233.1/73953